

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

In re Ethicon Inc. Pelvic Repair System
Products Liability Litigation

MDL No. 2327

THIS DOCUMENT RELATES TO ALL CASES

**APPLICATION FOR APPOINTMENT OF RICHARD D. MEADOW
TO SERVE ON PLAINTIFFS' STEERING COMMITTEE**

NOW INTO COURT comes Richard D. Meadow who respectfully files this application for appointment to the Plaintiffs' Steering Committee ("PSC").

I am the Managing Attorney of The Lanier Law Firm (hereinafter "LLF") in New York City; the Chair of LLF's pharmaceutical and medical device product liability litigation division; and a member of the Board of Directors of the New York State Trial Lawyers Association. LLF is currently investigating well over 1000 claims involving personal injuries suffered as a result of implanted transvaginal surgical mesh products, with the expectation of investigating many more claims in the future. We currently represent plaintiff in *Nix v. Johnson & Johnson, et al.* (S.D.W.V.; Docket No, 12-cv-00828), and intend to file cases involving the same Defendants in this Court and in the State of New Jersey.

I have been practicing law for nearly 30 years, and have been appointed to serve as a PSC member in the Zyprexa litigation (MDL 1596, E.D.N.Y.); the California Depuy ASR Hip System coordination (Proceeding No: 4649); the Heparin litigation (MDL 1953, N.D.OH.); and the New York State Bextra/Celebrex litigation (Index No. 560001/05). I have also been appointed to serve as Co-Liaison Counsel in the New Jersey State Levaquin litigation (Case No. 286); Federal-State Liaison Counsel in the Yaz/Yasmin/Ocella litigation (MDL 2100, S.D.IL.); and

Federal-State Liaison Counsel in the DePuy Pinnacle hip implant litigation (MDL 2244, N.D.TX). I have successfully tried over 20 cases to verdict, including verdicts that have appeared in the National Law Journal's list of largest verdicts in 2002 and 2003, and have been recognized as a New York Super Lawyer in 2009, 2010 and 2011.

LLF has offices in Houston, New York, Los Angeles and Palo Alto, and comes with substantial MDL-related mass tort products liability experience, representing thousands of injured clients. LLF has served on PSC's or functioned in leadership roles in numerous pharmaceutical and medical device product liability multi-district litigations, including but not limited to litigations concerning Zyprexa (MDL 1596, E.D.N.Y.); Avandia (MDL 1871, E.D.PA.); Neurontin (MDL 1629, D.MA.); Fosamax (MDL 1789, S.D.N.Y.); Heparin (MDL 1953; N.D.OH.); Chantix (MDL 2092, N.D.AL.); Digitek (MDL 1968, S.D.W.V.); DePuy ASR Hip Implant (MDL 2197, N.D.OH); DePuy Pinnacle Hip Implant (MDL 2244, N.D.TX); Yaz/Yasmin/Ocella (MDL 2100, S.D. IL.); and Actos (MDL 2299, W.D.LA.).^[1]

My firm's proven record concerning case resolution - which includes a historical verdict total exceeding one billion dollars - also justifies our inclusion on the PSC. Examples of verdicts include the very first Vioxx verdict for \$253 million; a \$56.3 million in a product liability case in 2010; a \$474 million verdict in oil and gas field case; and a \$118 million verdict in an asbestos mass tort case for 21 plaintiffs. Our settlement record also includes multiple eight figure settlements in mass tort cases; a \$32.5 million settlement in an antitrust case in 2009; a nine figure personal injury settlement on behalf of a number of oil/gas plant workers in 2008; a \$60 million settlement in an antitrust case in 2007; a \$160 million antitrust settlement in 2004.

^[1] We have also maintained lead roles in State Court product liability litigations concerning the following pharmaceuticals: Vioxx (Atlantic County, NJ); Bextra/Celebrex (New York County, NY); Levaquin (Atlantic County, NJ); Avandia (Philadelphia County, PA); Neurontin (New York County, NY); Fosamax (Atlantic County, NJ); Yaz/Yasmin/Ocella (Atlantic County, NJ); and Chantix (New York State).

Throughout the past many years, I have earned the reputation of working well with fellow plaintiffs' counsel, as well as with defense counsel and the Court, thereby leading to efficiencies for all participants. I have worked diligently to develop significant working relationships with lawyers and their respective firms from all over the country, including but not limited to Bryan F. Aylstock, Fred Thompson, III, Tom Cartmell, Aimee Wagstaff, Tom Anapol, Richard Arsenault, Lee Balefsky, Ed Blizzard, Lisa Blue, Jayne Conroy, Wendy Fleishman, Jeff Grand, Stacy Hauer, Scott Love, Victoria Maniatis, Dave Matthews, Karen Menzies, Mike Miller, Dianne Nast, Jerry Parker, Chris Placitella, Hunter Shkolnik and Joe Zonies (all of whom are proposed PSC members in this matter).

LLF will commit every resource required to enable this Court to expeditiously move the MDL through discovery and toward trial and/or early resolution - steps we have already undertaken by devoting substantial financial resources and dedicating a team of attorneys and paralegals to staff this litigation. I have also reviewed the Proposed Counsel Structure Plan filed with this Court on March 19, 2012 and join in the recommendation to the Court that the plan be accepted. If the Court requires any additional information about LLF or me, I will be more than happy to accommodate.

Dated: New York, New York
March 26, 2012

Respectfully Submitted,
THE LANIER LAW FIRM, PLLC

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CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2012, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ Richard D. Meadow
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